

TRANSCRIPT OF PROCEEDINGS

CC 96-98

FEDERAL COMMUNICATIONS COMMISSION

In Re:)
COMMON CARRIER BUREAU)
OPERATIONS SUPPORT)
SYSTEMS FORUM)

RECEIVED

JUN 26 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Volume: 1
Pages: 1 through 150
Place: Washington, D.C.
Date: May 28, 1997

HERITAGE REPORTING CORPORATION

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In Re:)
)
COMMON CARRIER BUREAU)
OPERATIONS SUPPORT)
SYSTEMS FORUM)

Room 856
FCC Building
2000 L Street, N.W.
Washington, D.C.

Wednesday,
May 28, 1997

The parties met, pursuant to notice,
at 9:06 a.m.

PARTICIPANTS:

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RICHARD WELCH, FCC

KALPAK GUDE, FCC

SUSAN MILLER VP/General Manager, ATIS

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I N D E X

<u>WITNESSES:</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>	<u>VOIR DIRE</u>
None.					

Hearing Began: 9:06 a.m.

Hearing Ended: 1:02 p.m.

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P R O C E E D I N G S

MS. KEENEY: Good morning, and welcome to the FCC's Common Carrier Bureau Operations Support Systems Forum. I give you a lot of credit for being here. You could be at a café sipping litchi, talking about the who the next FCC chairman will be, or whether all the Bell companies will merge with all of the IXCs. But instead, you are here at the FCC CCB OSF two-day forum. I congratulate you.

(Laughter.)

As you know, Operation Support Systems are extremely important to competition. They are the systems' databases and information that local exchange carriers use to provide telecommunication services to their customers. New entrants need access to OSS functions if they are to become true competitors.

In the Commission's local competition order, the Commission required incumbent LEC to provide nondiscriminatory access to unbundled network elements, and resale without discriminatory conditions. Included in this obligation is the requirement that incumbent LEC provide nondiscriminatory access to their OSF functions for pre-ordering, ordering, provisioning, maintenance and repair and billing.

The Commission said that this access must be under the same terms and conditions that the incumbents provides

1 to themselves or to their customers. The development of
2 meaningful local competition depends on such
3 nondiscriminatory access.

4 This forum is designed to provide information
5 about the advances that are being made in the provision of
6 OSS and to identify what additional steps, if any, are
7 needed to ensure access. We will be hearing from a number
8 of distinguished panelists, including representatives from
9 different parts of the industry who will share with us,
10 among other things, the progress of the development of
11 industry standards for OSS.

12 We are also fortunate to have with us both federal
13 and state representatives. I haven't found all of them yet,
14 but I think they are here. They may be in those cafes,
15 though. I am not really sure.

16 The states have been in the forefront identifying
17 and resolving issues concerning OSS, and these discussions
18 will no doubt be enriched by their experiences.

19 Thank you very much for coming, and I look forward
20 to a productive dialogue.

21 I would now like to introduce Richard Welch, who
22 is the Chief of our Policy Division, and he will be
23 moderating the panels.

24 Thanks, Richard.

25 MR. WELCH: Thanks, Gina.

1 Welcome everybody. We appreciate the large
2 turnout. We have a lot of people who have come to
3 participate in this forum over the next few days from all
4 parts of the country, and we appreciate their efforts in
5 taking time out of their busy schedule.

6 The purpose of the forum is to shine a spotlight
7 on operational support systems and the importance of that to
8 the emergence of local competition. And our goal of this
9 forum is to try to get below the surface, and explore a lot
10 of the issues, technical issues, practical issues, that face
11 incumbents and new competitors as we try to work together
12 to implement the competition that the Telecom Act was meant
13 to provide.

14 We have a number of panels set up over the next
15 two days and presentations. We have tried to come up with a
16 broad variety of speakers on these panels. We have
17 representatives of incumbent local exchange carriers, both
18 independents and Bell operating companies. We have a
19 variety of new competitors trying to enter the local market
20 under various types of competition, unbundled elements for
21 resell, various other avenues. We have vendors who will be
22 participating. We have federal and state government
23 representatives who will be involved in this. So we have a
24 wide variety of people that will be participating.

25 And the goal is to try to get the perspectives of

1 all these people, try to get a better understanding of what
2 the issues are and the problems are, and try to move this
3 process along a bit.

4 A few housekeeping details before we get started.
5 I'll go very quickly over the schedule that we will have in
6 the next couple of days just to remind everybody.

7 We are going to start out with a presentation by
8 ATIS, the Alliance for Telecommunications Industry
9 Solutions, to give us an update about the efforts to develop
10 industry standards in this area.

11 Then we will take a quick break. We will come
12 back with our first major panel, which will be an overview
13 of OSS functions, what is nondiscriminatory access and the
14 role of national standards. That panel will be an hour and
15 45 minutes.

16 We will take a short break and come back at noon
17 and have another panel on pre-ordering issues, and this is a
18 series of panels that we will have on more specific issues
19 on OSS.

20 And then tomorrow we will come back with three
21 panels. The first one will start at 9:00 in the morning.
22 It will involve ordering and provisioning issues. We will
23 take a break and then have a panel on billing issues, and
24 then our last panel will be on repair and maintenance.

25 The format of these panels will be basically

1 people, the speakers will be giving an opportunity for a
2 short opening statement. I emphasize "short" because time
3 is going to be precious on these, and we have a time keeper
4 over here who is going to be trying to keep everyone honest.

5 The Bureau will pose some questions to the
6 panelists to try to get some -- stimulate some discussion
7 going, and if we have time toward the end of these panels,,
8 we will open it up to questions from the floor.

9 I would encourage everybody to try to focus on
10 facts and what is actually happening out there in the
11 market, to try to get at these issues. We are trying to
12 keep this on a factual type basis; try to explore this. We
13 would like, as much as we can, to stay away from rhetoric
14 and hurling accusations at each other. So I would ask
15 everyone's cooperation in this effort to try to keep this on
16 track.

17 The final point I would make is basically
18 Operational Support Systems is an issue that stems from
19 Section 251 of the Act, the local competition provisions.
20 And the point of this forum is to explore this issue within
21 the context of that rulemaking, which continues today. We
22 have a number of petitions for RECON, and I heard something
23 about a court case that's still pending involving the 251
24 rules.

25 So there will be a video tape of all these

1 presentations made, and actually entered in the docket in
2 Docket 96-98. So the focus is going to be on the local
3 competition rules and that docket.

4 I should mention that there is another aspect of
5 the Act, Section 271, involving the entrants by Bell
6 Operating Companies into the long distance market, and that
7 also can present issues about OSS, but the purpose of this
8 forum is not to explore that context. We have a couple of
9 pending applications before us. I am sure others are
10 planning to file as well.

11 The point of this forum is not to discuss the
12 merits of those pending applications. I would urge everyone
13 please to try to stay away from that. If anyone does not
14 stay from it, and they make a presentation on the merits
15 involving one of those applications, we are going to have to
16 include something about that in docket in that ongoing
17 adjudication. So I would encourage everybody's cooperation
18 on that.

19 And then real briefly before we get to the ATIS
20 presentation, I was at home last night trying to think about
21 how to kick this off, and it occurred to me that what
22 happened over the weekend might be relevant here.

23 My wife and I are baseball fans, and, in
24 particular, minor league baseball fans. And so over
25 Memorial Day Weekend we decided to take the kids and jump in

1 the minivan and drive to the Eastern Shore of Maryland to
2 Salisbury, Maryland, to see the Delmarva Shorebirds play.
3 The Delmarva Shorebirds are the single affiliate of the
4 Baltimore Orioles, who, I might add, I might digress for
5 those Yankee fans in the audience, Baltimore Orioles are now
6 in first place by eight games over the Yankees.

7 (Laughter.)

8 But I do digress.

9 Anyway, the Delmarva Shorebirds, that single A
10 baseball is comprised of young kinds who are basically in
11 their early twenties who are trying to make it to the major
12 leagues. And some of them, only a handful of them will make
13 it. A lot of them, frankly, are not that good, and they
14 make a lot of mistakes.

15 So we started watching this ball game in Salisbury
16 Saturday night, and the Shorebirds proceed to commit five
17 errors in the first three innings of the game. They
18 committed four errors in the third inning, and the poor kid
19 playing shortstop committed three of those errors, and
20 promptly found a seat on the bench when the manager took him
21 out. And as a result of those errors, the opposing team
22 scored nine runs in the third inning. And so the Shorebirds
23 were immediately down by this huge margin. They were ever
24 able to recover. They were never able to get back in the
25 game, and ultimately they lost 11 to 1.

1 Now, you probably are wondering what the heck does
2 this have anything to do with OSS. This was kind of a
3 strange logic here, but this is what happens to you when you
4 work at the FCC for a year and a half implementing the
5 Telecom Act. You start seeing everything through the prism
6 of the Act, and it's -- as Ross Perot says, "It's kind of
7 sad," but that's the way.

8 (Laughter.)

9 So, anyway, this minor league baseball game may
10 teach us something about local competition and operational
11 support systems. If you think about a new entrant trying to
12 enter the market, who does not have a redundant network of
13 its own, it has to rely on the incumbent for certain things.
14 It's either going to be reselling their services or it's
15 going to need access to unbundled network elements. It
16 needs something from the incumbent in order to compete with
17 the incumbent, and presumably to try to take away business
18 from the incumbent.

19 In order to do that, there has to be communication
20 between the incumbent and the new entrant. There has to be
21 a flow of information back and forth between these two
22 parties to make this work. And if anything happens in that
23 flow of information, it can cause a lot of problems.

24 If you think about what a new entrant is trying to
25 do, they are trying to go around to potential subscribers

1 and persuade them that I have a better service, I provide
2 you something different than incumbent at a competitive
3 price. Give me your hard-earned money and come with me.

4 But if in the process of this communication back
5 and forth between the two parties dozens of things can go
6 wrong. You know, orders can get lost, orders can get
7 delayed, service cannot be turned up promptly. You know,
8 calls for repairs may go unanswered or take delay. And when
9 that happens it reflects on the new entrant. From the
10 perspective of the new customer, they are looking at the new
11 entrant and thinking that the new entrant is committing
12 errors and dropping the ball.

13 And if all this happens early on in the first
14 three innings of the ball game, the new entrant is basically
15 never going to be able to recover and never going to be able
16 to get back in the ball game. So that's sort of a tortured
17 way of looking at it, but in a sort of weird way minor
18 league baseball is a microcosm of local competition in OSS.

19 (Laughter.)

20 My wife would be appalled if I told -- if she
21 heard me tell that story today.

22 So, anyway, we shall now proceed. Enough with
23 minor league baseball. Let's proceed with our first
24 presentation of the day, which will be from ATIS, and I
25 would like to introduce the three folks who will be making

1 this presentation.

2 We have Susan Miller, who is Vice President and
3 General Counsel of ATIS. We have Glen Sirles, who is
4 moderator of the Ordering and Billing Forum, also with SBC
5 Corp. And we also have Dianne Moore, who is Assistant
6 Moderator of the Ordering and Billing Forum, for MCI. And
7 they are here to give us a presentation about their work.

8 MS. MILLER: Good morning. I am Susan Miller.

9 What we thought we would try to do today is give
10 you a picture of the context in which the work is occurring
11 in the Alliance for Telecommunications Industry Solution,
12 ATIS for short, sponsored Order and Billing Forum. And then
13 what we also thought we would do is actually take a look at
14 the work that's going on.

15 So we will start by giving a very brief overview
16 of ATIS, an overview of the Order and Billing Forum,
17 including the mission, the history, the structure and the
18 process, and then we will get into the role of the OBF in
19 addressing issues for access to -- for access to Operation
20 Support Systems for local competition.

21 We will also look at the specific OBF committee
22 involvement, and then we will give you a summary of the work
23 that has occurred, is in progress, and is projected for the
24 future.

25 The purpose of ATIS is provide an opportunity for

1 timely resolution of international and national
2 telecommunications issues. ATIS achieves this purpose by
3 initiating and maintaining open industry forums to address
4 technical and operational issues. In support of the forums,
5 ATIS provides an information source to its members and to
6 the participants of the ATIS committees. And, finally, our
7 ultimate goal is to promote industry progress with minimal
8 regulatory and legislative intervention.

9 ATIS itself sponsors nine industry committees and
10 forums, and we also provide administrative support to those
11 committees and forums. The committees and forums, of which
12 the Ordering and Billing Forum is one of them, is open to
13 all interested parties or any materially affected parties.
14 You do not need to be a member of ATIS to participate in the
15 committees and forums.

16 To date, these nine what I will call parent
17 committees and forums have over 2,000 industry participants
18 and over 300 companies are represented there.

19 Membership in ATIS itself is open to the North
20 American telecommunication service providers with the plant
21 investment in transport and/or switching equipment, as well
22 as the Caribbean World Zone I telecommunication service
23 providers, as well as resellers, manufacturers, and enhanced
24 service providers.

25 The ATIS committees, like the Ordering and Billing

1 Forum, are led by industry volunteers, and we seek
2 volunteers from the industry, from different industry
3 segments so that we can ensure balanced representation for
4 each of the committees in the leadership role.

5 One of the most critical elements of being an
6 ATIS-sponsored committee is that we insist upon due process.
7 And for us, due process requires that certain fundamental
8 principles be incorporated into the operating procedures for
9 each of the ATIS-sponsored committees. We insist upon open
10 meetings. We insist upon issues being industry-wide in
11 scope. That is, issues that are subject to negotiations
12 between companies one on one are not appropriate for
13 discussion in ATIS forums. We do not discuss cost, price or
14 anti-trust sensitive matters.

15 We provide advance notification of meetings. We
16 publish our agendas in advance. We provide recordkeeping of
17 all of our proceedings, and the committees' output are
18 consensus resolution. We provide advanced notice of those
19 consensus resolutions before they go into a final closure
20 stage. And most importantly, these consensus resolutions
21 are for voluntary implementation. That is, they are
22 nonbinding, and there is an expectation by participants that
23 there will be good faith discussions of all of the
24 resolutions and timely implementation. But we do recognize
25 that implementation is really a business decision.

1 What I thought I would do is try to point out
2 where the focus of our discussion is going to occur today.
3 This is really a pretty intricate overview of the ATIS
4 committees. On the left-hand side you will see the nine
5 parent committees which I referred to. We are actually
6 going to be focusing our work today, and Glen and Dianne are
7 going to spend their time almost exclusively in talking
8 about the Ordering and Billing Forum which resides under the
9 auspices of the Carrier Liaison Committee. However, there
10 will also be references to the Network
11 Interconnection/Interoperability Forum, another ATIS-
12 sponsored group that does repair and maintenance issues, and
13 we will also make reference to liaisons from the Ordering
14 and Billing Forum to the Electronic Data Interchange
15 Committee, as well as the Electronic Communications
16 Implementation Committee. These are sub-tending committees
17 under the Telecommunications Industry Forum.

18 So most of the work is occurring in these groups,
19 but the thrust of it is being handled by the OBS.

20 So now I will turn it over to Glen and Dianne who
21 will launch into the OBF process and specific work that the
22 OBF is doing with respect to OSS access.

23 MR. SIRLES: Thanks, Susan.

24 We thought it was important to highlight the OBF
25 mission statement for you this morning. Essentially, it is

1 to provide a forum for customers and providers in the
2 telecommunications industry; to identify, discuss, resolve
3 national issues which affect ordering, billing, provisioning
4 and the exchange of information; about access services,
5 other connectivity and related matters.

6 The key word there is "other connectivity." We
7 made a change back in 1995 to expand the scope of the OBF.
8 Traditionally, we had been founded for access services being
9 established in 1985. But by consensus we expanded our
10 mission and scope as we realized that there were changes
11 taking place in the industry that were going to require the
12 process of forum activity in order to resolve the issues
13 that were being presented to the industry. The first local
14 competition issues were introduced at that time, in May of
15 '95.

16 And important key here is that we had very little
17 regulatory direction at that time. A lot of things were
18 still unknown. A good many of the companies had to
19 formulate policy before they could actually begin discussing
20 issues, and get the process moving. But the process has
21 moved and it's moved quickly, and it's moving even more
22 quickly as we speak.

23 The last thing I would like to point out is
24 throughout our history the OBF has resolved over 1,300
25 issues between customers and providers in the

1 telecommunications industry. We do have a history of
2 resolving issues between ourselves.

3 There are six standing committees in the OBF, most
4 of which are involved in local competition issues. Within
5 the structure, we have the Billing Committee, the Ordering
6 and Provisioning Committee, Message Processing,
7 Subscription, Telecommunications Services Ordering Request
8 Committee and the SMS/800 Number Administration Committee.

9 SMS/800 Administration is the only committee not
10 currently discussing local competition issues. The reason
11 being that their process is already designed to handle both
12 inter and intra 800 and toll free service.

13 Dianne.

14 MS. MOORE: In understanding with regard to
15 standard resolutions that we have to go through to get a
16 consensus. Susan talked about there is no voting, but there
17 is a large number. We talked about -- there is 475 people
18 we are trying to get consensus from, and we have membership
19 here representing a significant portion of the industry's
20 companies.

21 Meeting frequency, you need to understand in terms
22 of how we can move, how quickly we can move or not move on
23 some of these standard resolution. The only requirements
24 that we really have is that there are four quarterly
25 meetings through the year for a week long when all the

1 committees come together. However, each committee's work is
2 dictated by its workload, and we have been in a situation
3 for the last year where committees have been meeting week
4 long sessions once a month in some committees. So they will
5 move as quickly as need be based on the workload, and the
6 workload right now is being driven by the local issues in
7 almost all of the committees that we are dealing with
8 except, as Glen indicated, SMS.

9 This workload will come into effect where we talk
10 about our attempts to expedite the process and get to some
11 resolutions and some guidelines for local OSS as quickly as
12 we can.

13 Throughout our presentation we are going to talk
14 about the output of the OBF, and what we do in terms of the
15 guidelines and the standards for OSS. We need to understand
16 output for us is that we deal with business issues between
17 companies: how you need to conduct business exchange
18 between companies. When we talk about interface outputs,
19 interface specifications that we come up, it revolves around
20 the business data needed, the usage rules, when and how to
21 use data, when something needs to be exchanged. It can deal
22 with the format of the data for electronic exchange, but we
23 don't deal with the electronic protocols. So when we say
24 interfaces, it's not the protocol interface. I just want to
25 make sure of that.

1 In terms of how we get to resolution, as Susan
2 mentioned, as part of being an open forum, trying to get
3 industry representation in here, we have tried to move
4 expeditiously, yet fairly. So we have two stages of
5 closure. When you get to a resolution, it's called initial
6 closure, and people can review this. It's published in the
7 industry, and it does go final to a quarterly meeting.

8 And the best case scenario an issue can be
9 introduced at OBF and be in final closure in 42 days.
10 That's if you hit every milestone exactly right and get
11 agreement the first time through. That's your best case.
12 More typically, it will take several meetings and a couple
13 of different quarterly sessions to make closure.

14 We do recommend formally to our members and our
15 guidelines that companies begin the implementation
16 considerations at the stage of initial closure. We did a
17 study a few years ago about the occurrence of initial
18 closure to final closure and found that in over 80 percent
19 of the issues it moves straight through with no changes, and
20 there is low risk of starting your implementation work at
21 initial closure, and that is what we recommend. Again, this
22 is a step we need to help expedite what we are trying to do
23 here.

24 You are going to see some stuff here, we want to
25 make sure it's clear that there has been a massive amount of

1 work. We have participants here who have other
2 responsibilities and they are doing, I think, a yeoman job
3 in getting some of the stuff done, but we're going to show
4 you some of the stuff now.

5 The process we are talking about in relation to
6 what this forum is to do, we don't deal with repair and
7 maintenance. We deal with the pre-ordering, ordering
8 provisioning and the billing. both LEC to LEC and user
9 billing. And this is how our committees that Glen showed
10 you a few minutes ago would map to those OSS processes.

11 MR. SIRLES: As Susan mentioned, the Network
12 Interconnection and Interoperability Forum, or the NIIF,
13 deals with the repair and maintenance issues. We are not
14 going to discuss those issues in the forum this morning, but
15 we did want you to know that within the ATIS structure those
16 issues are being dealt with.

17 We are going to talk about, however, the
18 Telecommunications Industry Forum, or TCIF, particularly two
19 components of it; the Electronic Data Interchange Committee,
20 and the Electronic Implementation Committee. We have within
21 OBF established liaisons with those groups in order to
22 assist us in local ordering guidelines and interface
23 standards. Particularly, we have created a formal liaison
24 with the EDI group for handling our local service request
25 forms and the mechanization of those forms through the

1 electronic data interchange process.

2 The way the liaison works the OBF committees are
3 responsible for the business process flows, the interface
4 guidelines and informational requirements. Particularly, we
5 have created the Local Service Ordering Guidelines, Volumes
6 I and Volume II, Version 2 was released March of '97.
7 Within that binder are contained the local service request
8 forms. We brought a copy of that with us this morning just
9 to show you. The binder really doesn't really mean much,
10 but in effect within this binder every blue tab is a type of
11 service, and everyone of these tabs contains the forms
12 necessary to order the basic services required for local
13 competition.

14 These forms in this volume have been referred to
15 the Electronic Data Interchange Committee. They have
16 included within their Version VII the information that was
17 in our Release 1 of the local service request. It is out
18 for ballot now. The ballots should be final in June of '97.

19 LSR Version 2 should be included in EDI Version
20 7.1, which should be out for ballot in September of '97.

21 It's also important to realize that the Electronic
22 Communications Implementation Committee suggest platforms to
23 the OBF that can be used for the electronic communications.
24 We are finalizing our formal liaison with that group that
25 will allow us to exchange information back and forth with

1 them in a quick and efficient manner.

2 The way the liaison process works is essentially
3 we have designated individuals that attend each other's
4 committee meetings. The OBF works an issue to closure, and
5 then refers that issue to the Electronic Data Interchange
6 Committee. Questions flow back and forth between the groups
7 as the EDI group models the data. Once that process is
8 finished the guideline is balloted by EDI.

9 What is important to realize here is that we have
10 created a process that is interactive back and forth while
11 the issue process is taking place. We did that for the sake
12 of time, for the sake of clarity. It helps us get there
13 faster, and get a product out the door that is reliable once
14 we have completed the process.

15 But it is also important to note that within OBF
16 many local competition issues touched existing processes,
17 and we did not necessarily have to create new processes to
18 develop guidelines. Work and support of many other areas
19 fall into this area. Much guideline work is already
20 completed and is stand-alone. The work we did for the
21 access service request modifications that allow the ordering
22 of interconnection trunks is a good example of this.

23 Also, where other non-OBF groups were needed, we
24 used existing relationship to facilitate the updates. Good
25 example of this are the things we did in billing, our

1 relationships that already existed with Bell Corp's
2 technical review groups for billing. So within the process
3 we have used our existing structure that we had in place to
4 accommodate the needed guidelines on top of the local
5 service ordering process.

6 MS. MOORE: We're going talk about the content of
7 the work and what this actually means, the things Glen
8 talked about, the local service requests and so forth, what
9 does it mean in terms of a business sense.

10 The order we are going to go in is the order of
11 the panels that the FCC set up, which is a bit unfortunate
12 from my point of view, and the pre-ordering in some ways we
13 have done probably the least in this area. Ordering was
14 deemed to be a higher priority. That's where a lot of the
15 initial work went into of the committee that does this work.
16 So you will notice the first pre-ordering issue was
17 introduced in May of '96.

18 They are working on the requirements, information
19 requirements between companies, so you can do pre-ordering.
20 There is expectations. This committee is meeting monthly,
21 and this is a high priority for their meetings. They had it
22 in May. There will be another meeting in a week and a half.
23 There is a strong probability or possibility that they could
24 actually be putting the pre-ordering issues into final
25 closure at the August quarterly meeting, okay.